

Bassetlaw Local Plan
Green Gaps Report
Second Addendum
April 2021



Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —



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NB: Report should be printed and viewed in A3 format

1 INTRODUCTION

1.1 In 2019 Bassetlaw District Council commissioned Clive Keble Consulting and Carroll Planning+Design to undertake the following three studies to support the emerging Local Plan:

- A review of the 2009 Bassetlaw Landscape Character Assessment;
- A (landscape based) Land Availability Assessment (of 27 sites); and
- A report on eight proposed Green Gaps.

1.2 The purpose of the Green Gaps report was to examine the wider context, establish a methodology and identify physical boundaries for each of the proposed Green Gaps and to justify why they are important. The intention of the Green Gaps was to enable the District Council to be able to use the new Local Plan to safeguard the characteristics of areas of “important landscape” around more sensitive locations where there has been pressure for development, including Worksop, Retford, Langold/Carlton and Harworth/Bircotes. It was necessary to ensure that the Green Gaps report was consistent with the recommendations in the Land Availability Assessment report and the conclusions from the Review of the 2009 Landscape Character Assessment, substantive parts of which remain applicable. The methodology recognised the need to set Green Gaps in a clear context, including:

- alignment with national policy and guidance;
- relevant recommendations/actions in the Natural England National Character Areas and the 2009 Bassetlaw Landscape Character Study;
- how Green Gaps fulfil Objectives/Policies in the 2011 Core Strategy (where still relevant);
- identify/assess how Neighbourhood Plans may provide a context for Green Gaps;
- consider the purpose of Green Gaps in relation to other policies and appropriate land uses;
- the basis for defining boundaries for and extent of Green Gaps;
- looking at comparable approaches in other Local

Planning Authorities; and

- research/site visits on location, land use, neighbouring uses, topography, landscape, designations, notable views, recreational and habitat connectivity.

1.3 The Local Plan was subject to a formal public consultation in January/February 2020. Arising from this, further work was commissioned to consider the comments received and update information on the national context and examples of the use of Green Gaps in other Local/Neighbourhood Plans. That report, the October 2020 Addendum, enabled the District Council to:

- Devise a new freestanding Green Gaps policy (ST40) which carried forward the criteria to protect the defined areas of land but also recognised the potential for some development be allocated or promoted within Green Gaps, subject to strict design codes and a landscape-led approach being taken. This was applied to a particular location south of Retford, for which a recommended approach was set out.
- Make any necessary adjustments to proposed Green Gap boundaries.
- Reduce ambiguity between Green Gaps and Green Belt, e.g. by noting that a Green Gap, whilst intended to be robust/lasting, could be reviewed at each iteration of the Local Plan or every 5 years.

1.4 The representations made in the January 2020 consultation informed a revised version of the Local Plan which was the subject of a further round of consultation between 25th November 2020 and 20th January 2021. This gave rise to further comment concerning Green Gaps and these are considered in this report, alongside an updating of the contextual material in the October 2020 Report.

1.5 The context for this further report remains that the landscape and natural environment of Bassetlaw is the most readily appreciated feature of the district. It is influenced by the underlying geology, climate, habitats and human influence, past and present. There are no national statutory landscape designations, but approximately 98% of the district is rural and the distinctive and contrasting landscapes, which are highly valued, provide an attractive setting

for towns and villages. These circumstances generate significant pressures on the countryside. Through a range of policies, including Green Gaps, the emerging Local Plan has an important role to play in ensuring that new development does not undermine these fundamental assets.

2. BENCHMARKING UPDATE (OCTOBER 2020 TO MARCH 2021)

2.1 In this section, a short, focused update is provided on the consideration of Green Gaps in Local Plans and Neighbourhood Plans, the intention being to consider new developments and changes, not to repeat what was written in the October 2020 Addendum.

Local Plans

2.2 In the October 2020 Addendum report, the Cheshire East Site Allocations and DPD which maintained the established concept of Green Gaps, was considered. That Local Plan is still to be submitted, but after consultation in 2019 it was amended, and the Council published a revised version to invite representations before Submission. That consultation closed on 23rd Dec. The responses are now being considered and submission is anticipated in the second quarter of 2021. One of the supporting documents is a Strategic Green Gap Boundary Definition Review which was prepared in August 2020. It sets out the methodology to define the detailed boundaries of the (Strategic) Green Gaps drawing upon an earlier study, the 'New Green Belt and Strategic Open Gap Study' (Envision 2013) and a Strategic (Local Plan Strategy) Policy which had established the principle/broad locations of Strategic Green Gaps. This work established the three main functions of Green Gaps as: (i) to provide long term protection against coalescence, (ii) to protect the setting/separate identity of settlements, and (iii) to retain the existing settlement pattern by maintaining the openness of land. The proposed boundaries have been defined using identifiable, physical features on the ground that are likely to be permanent including: railway lines, roads, canals and rivers & brooks, established hedges and woodland, established woodland, built development with strong established boundaries, prominent topography, and public footpaths.

2.3 It is clear that the approach which is being taken in Bassetlaw reflects the longer established practice in East Cheshire.

2.4 The established firm, Land Use Consultants (LUC) has undertaken research on Green Gaps and Local Plans. An article, "How to protect locally valued landscapes" can be found on the LUC website: <https://landuse.co.uk/locally-valued->

landscapes/ This notes that: "Local landscape designations are valuable tools for local authorities seeking to manage growth, protect valued landscapes and guide positive landscape change." It goes on to consider the role of Green Gaps noting that: "Green Gaps could be a useful feature of local planning to: (i) Avoid coalescence and retain the separate identity of settlements and (ii) Protect high quality landscapes on the urban fringe, giving access to the countryside." An LUC review of Local Plan* policies and Inspectors' reports on 'green gaps' is referred to which showed that they were generally found sound at Examination, but some lessons were apparent:

- Green Gaps must be based on robust evidence;
- Evidence supporting gap policy should take account of potential new boundary features that affect the risk of settlement coalescence (e.g. infrastructure);
- Gaps intended to prevent coalescence should only include land to maintain separation, e.g. rather than protecting the setting of heritage assets;
- If a Green Gap policy seeks to preclude certain types or scales of development, this must be based on evidence;
- Green Gap policies should focus on protecting specific areas/features between settlements and seek to protect all rural areas outside settlements.

*The Local Plans referred to include Fareham (2015), Canterbury (2017), North Warwickshire (2015) and Basingstoke & Deane (2014).

Neighbourhood Plans

2.5 The original 2019 study established that the proposed Green Gaps 1, 2, 3, 4 and 5 had potential links to made or examined Neighbourhood Plans (NP) in Bassetlaw and the October 2020 Addendum referred to the East Hagbourne NP examination. Subsequently, there has been progress in Bassetlaw with five NPs going to referendum in May 2021. One, the Hodsock & Langold NP, includes part of GG2 (Oldcotes/Langold/Carlton in Lindrick). It is pertinent that there appeared to be no (Reg.16) representations from landowners or developers related to Green Gaps. The Examiners Report (June 2020) included the following analysis which supports

the Green Gap which could apply in principle to the concept and to other proposed areas.

"Exec. Summary (3) The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on designating local green spaces, identifying Green Gaps and safeguarding its distinctive character.

5.8..... the new Local Plan will be submitted for examination at the end of 2020. On this basis it is not at a sufficiently-advanced stage to play any significant role in the examination of the submitted neighbourhood plan. I have however given appropriate weight to the emerging policy on Green Gaps insofar as it directly impacts on the submitted neighbourhood plan.

5.14 (Site Visit) I looked at the proposed Green Gaps to the south of the village. In particular, I walked along the bridleway to the east of Doncaster Road into the proposed Gap to the south east of the village. I saw the way in which it related to natural features in the wider landscape.

6.10 (Contributing to SD) In the environmental dimension the Plan positively seeks to protect its natural, built and historic environment. It includes specific policies on Green Gaps (Policy 7).

7.38 (Policy 7 Green Gaps) This policy proposes the designation of green gaps. Two are proposed to the north of Langold (to maintain a green gap between the village and Oldcotes) and two to the south of Langold (to maintain a green gap between the village and Carlton).

7.39 The Plan comments about the way in which Langold sits in the wider landscape in general terms, and the potential for its coalescence with settlements both to the north and to the south (outside the neighbourhood area) in particular.

7.40 Whilst the supporting text in Section 15 does not directly address the issue it is clear that the two proposed green gaps the north of the village have been designed to sit to the immediate north of sites 1 & 2 which have planning permission for major housing developments.

7.41 In its response to the clarification note the Parish Council commented about the way in which it had sought to develop its policy approach to follow the approach in the emerging Bassetlaw Local Plan. Policy ST34 of that Plan identifies a series of Green Gaps in the wider District. One of the proposed Gaps in that Plan is Gap GG2 (Oldcotes – Langold - Carlton in Lindrick). Details about the proposed policy approach in the emerging Local Plan are set out in the accompanying Green Gaps Study. The proposed Green Gaps in the neighbourhood area are significant elements of the proposed (and larger) Green Gap 2 in the emerging Local Plan.

7.42 Whilst the basic conditions require that I examine the Plan against adopted local policies (in this case the Core Strategy) Planning Practice Guidance (41-009- 20190509) comments that 'where an NP is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in the emerging NP, the emerging local plan.....with appropriate regard to national policy and guidance'. In this context I have taken account of the approach towards Green Gaps against that in the emerging Local Plan.

7.43 I looked at the proposed Green Gaps carefully when I visited the neighbourhood area. I saw the way in which they sit within the wider landscape. In particular I saw the way in which the proposed Gaps to the north of Langold would relate to scale, nature and location of the two consented residential sites to the north of the village. I also took account of the helpful response from the Parish Council to the clarification note questions about the extent to which the proposed Gaps would have readily defined natural or man-made boundaries.

7.44 On the basis of all the evidence I am satisfied that the two proposed Green Gaps to the south of the village of Langold are appropriate and would serve a particular and distinctive role within the neighbourhood area. They follow natural boundaries in general, and a natural stream to the south and Langold Country Park and the built boundary of Langold to the North in particular. They also highlight the difference between the setting of Carlton to the south and Langold to the north. This is particularly

highlighted by the extensive views of Hodsock Manor on rising ground from the south.

7.45 I am also satisfied that the element of the proposed green gaps to the north of Langold and to the west of Doncaster Road are appropriate and would serve a particular and distinctive role within the neighbourhood area. In this case they would dovetail with the extant planning permissions to the immediate north of Langold and would retain an open element of open landscape between Langold and Oldcotes.

7.46 The policy itself has three parts. The first designates the areas concerned as Green Gaps. The second explains the purposes of the proposed Green Gaps. The third comments that development will not be supported within a Green Gap which would conflict with the purposes of their designation.

7.47 Whilst I understand the approach taken it incorporates a degree of both policy and supporting text. I recommend a modification to combine the second and third parts of the policy. I also recommend that the significant element of supporting text in the submitted policy is repositioned into the existing supporting text in Section 15 of the Plan.”

The amended policy (Policy 7: Green Gaps), which is in the Referendum version of the NP reads as follows.

1. Two Green Gaps are designated, as identified on figures 11 and 12: Green Gap 1: land between Langold and Costhorpe; and Green Gap 2: land between Langold and Oldcotes.

2. Proposals for built development within the identified Green Gaps will be carefully controlled. Development will only be supported where it would retain the separate identity and character of Langold Village and its relationship with settlements to the north and south of the neighbourhood area.

In the NP, Figs. 11 & 12 show the Green Gaps, and they are explained in detail in paras. 15.1 to 15.5.

3. UPDATE ON PROPOSED CHANGES TO THE PLANNING SYSTEM (OCTOBER 2020 TO MARCH 2021) AND THE LIKELY ONGOING IMPACT OF COVID-19

3.1 The October 2020 Addendum considered the Planning White Paper. The consultation on the White Paper received a large number of widespread and varying responses and there is uncertainty about when legislation will emerge and what the detailed nature of the changes will be. However, a Government press release accompanying the publication of the White Paper in August 2020 included the statement that: *“Valued green spaces will be protected for future generations...”* Alongside the proposal that simplified Local Plans would place land in three categories; growth areas (suitable for substantial development), renewal areas (suitable for some development) and protected areas, this indicates a clear role for Green Gap type policies.

3.2 It remains the case that were the new Bassetlaw Local Plan to be adopted by the end of 2021, it could have an operational life of at least three years. Local communities, landowners and developers would all benefit from the increased certainty that that an up-to-date Local Plan would bring. A strategy that determines locations where development would be appropriate, locations where it would not and where particular attention to scale, layout and design would be important. The proposed Green Gaps have a critical role to play in this.

3.3 The LUC research referred to in Section 2 also covered the NPPF commenting that, whilst the protection of existing settlement pattern is not specifically mentioned in the NPPF (2019), the concept of settlement gaps is broadly consistent with Paragraph 20, which states that: *“...strategic policies...should include those...necessary to provide... conservation and enhancement of the natural built and historic environment, including landscape and green infrastructure.”*

3.4 The LUC study also states that: *“As the Coronavirus pandemic has emphasised, it is vital to recognise how special local landscapes can be to people. Local landscape designations are valuable tools for local authorities seeking to manage growth, protect valued landscapes and guide positive landscape change.”* There have been two further “Lockdowns” since the October 2020 Addendum was produced, and these have further reinforced the vital

role that accessible countryside, on the edge of and between settlements, plays. In addition to the role that Green Gaps have in landscape, local character and the identity of settlements, they can contribute directly to health and well-being, both mental and physical.

3.5 Although it refers to proposed Local Green Spaces, the following extract from the recent (Feb. 2021) Examiners Report into the Ropsley & District NP (in South Kesteven) illustrates how the value of accessible local open spaces in Covid-19 times has entered mainstream planning thought. *“I have taken account of their importance in the small communities concerned. In this context I have taken account of the recent heightened importance of open space for both amenity and health and well-being considerations are the Covid pandemic has caused people to spend much more time in their local environments.”*

3.6 There are references to the importance of accessible green spaces and the countryside in post Covid-19 planning activity, in papers produced by organisations ranging from CPRE to consultants and development interests. It is reasonable to assume that Green Gaps will have a key role to play in this.

4. CONSIDERATION OF COMMENTS ON GREEN GAPS ARISING FROM THE SECOND CONSULTATION ON THE (SECOND) DRAFT LOCAL PLAN

4.1 Thirteen comments have been considered. These include support, both in principle and for specific Green Gaps, but the majority relate to objections to the principle, the details of some Green Gaps and questioning of the evidence base.

Support

4.2 Support in principle was expressed by individuals, NP groups, local organisations and the National Trust (albeit that these comments also called for the policy to be more aspirational and for further Green Gaps).

Objections

4.3 The eight objections, include some references to the principle of Green Gaps and concerns over methodology but the majority focus on specific boundary issues and the relationship between Green Gaps and existing businesses and proposed new development sites.

Consideration of comments

4.4 These comments received are set out in the table below which also includes suggested responses.

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 163 Resident</p> <p>I support the proposal for Green Gap 7- Retford South- Eaton. However, given how visible the land on the east side of Ollerton Road (adjacent to Lansdown Drive) is from London Road, I would suggest that the policy should state that there should be no built development in this location.</p>	<p>There are views of the open land from London Road with the (Lansdown Drive) housing behind it (See Appendix- Photo 1). However, the existing rectangular built edge to the settlement is dominant in the landscape. The form of the existing built up area and the need to achieve an efficient and effective use of infrastructure suggests, therefore, that development east of Ollerton Road/ South of Lansdown Drive is possible without prejudicing landscape quality, whilst still enabling a viable and lasting Green Gap of an appropriate size, to be defined. A sensitive design and layout, respecting topography and utilising new open space and planting could achieve a satisfactory landscape relationship with the proposed GG7 to the South. As noted in previous reports, topography and the presence of the PROW to the South, create an opportunity for a recognisable and robust edge to built development within the Green Gap.</p>
<p>Ref. no 133 Scrooby Neighbourhood Area Plan</p> <p>Page 129 – This has to be a must and defines the spaces between settlements or builds. However, it is not currently present in (for example) Ranskill/ Torworth where a development is being allowed directly on the border across the 2 villages.</p>	<p>In the Local Plan Scrooby is defined as a Small Rural Settlement with limited new dwelling requirements. The (Draft) Scrooby NP covers Scrooby and Scrooby Top and it defines a settlement boundary for the main village. Land outside that area is open countryside where the LP policies ST1 & ST2 would apply to new development and there are no proposed development sites.</p> <p>Ranskill is also identified as a Small Rural Settlement, with a new dwelling requirement of 30. This is being addressed through an emerging NP. A Draft Plan includes “Significant Green Gaps to the north and south of the village” and it is appropriate that this local matter is determined through the NP process rather than addressed in the higher-level Local Plan.</p> <p>Torworth, to the south of Ranskill, is regarded as being in the countryside in Policy ST1.</p> <p>Scrooby lies to the south east of the proposed GG1 Bircotes – Bawtry across the River Ryton, which is a long term and robust GG boundary.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 142 Retford Branch Labour Party</p> <p><i>Policies referred to here are equivalent policies in the January 2020 DLP</i></p> <p>The Party acknowledges the determination of the Plan to preserve and improve the Green Spaces in Section ST34 but wonder if it is time to flood GG6 and ST48.</p> <p>Both these areas are poor quality low lying historic flood plain areas, and perhaps now is the time to create managed Wetlands to help mitigate the flood risks. If we do not start the conversations about returning some lands to a more natural historic state as part of a managed flood plan, then we will be still mopping out the same houses in 2040- unless they have been abandoned.</p> <p>Pockets of Green Space in urban areas should be considered for local environment management opportunities. There is good evidence to show that communities will look after their precious amenity areas if they are given a role in its management.</p> <p>The Labour Party believes increasingly, local authorities are working with community organisations to see if new models of managing these spaces can be developed, creating efficiencies and added value services and activities as a result.</p> <p>Suggested changes to the plan:</p> <ul style="list-style-type: none"> - The Plan should make a declaration that the future Flood resilience of Town Centres- Worksop floods more frequently than Retford town- is a key objective of the Plan, and this 'will include restoring historic Flood Plains in the Idle Valley'. - The Plan needs to make clear that there will be the opportunities for Community involvement in environmental protection and green spaces - The Plan should note remits of the proposed Retford Town Masterplan to include a specific environmental plan for the Town Centre. 	<p>These comments represent support in principle and for the proposed boundaries of the Green Gaps.</p> <p>The suggestions relating to flood plains and washlands are reasonable as a way of addressing climate change. However, the comment does raise the question of longer-term management rather than the actual designation of Green Gaps with which the Local Plan is concerned.</p> <p>The Policy ST41 (Green and Blue Infrastructure) and other Local Plan policies apply to the comments on Worksop and Retford Town Centres.</p>

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 135 Pegasus on behalf of landowner</p> <p>Policy ST34: Green Gaps</p> <p>As discussed in our previous representations, it is considered that the Green Gap to the north of Langold should be amended to exclude the full area of the extended site proposals (as discussed below). This would not detrimentally impact on the openness, appearance and functionality of the landscape quality of the Green Gap and specifically the Green Gap would continue to deliver its primary purpose of preventing coalescence between Langold and Oldcotes. This would not then prevent the development proposals, along with their proposed landscape mitigation, from being able to deliver future sustainable development which was compliant with Policy ST34. It is not clear how Green Gaps have been identified as the associated report only includes an assessment of the areas already suggested by the Council.</p> <p>Consequently, it is unclear why a Green Gap has not been considered between Worksop and the A1 (and on to Retford) where the risk of linear urban sprawl is clearly at its most marked. It is notable that while this area to the east of Worksop has not been assessed by the Green Gaps Report, the report specifically refers to 'settlements extending into the countryside with the potential for them to merge in the future... erosion of local landscape character between settlements some of which is locally valued and has historic value. Examples of this include... Worksop (E). The (commercial) development of Manton Wood with major HQs and warehouses; ... [and] The A1 junctions, services and associated development (Blyth, Morton...)', p15. With a proposed Garden Village to be sited between Worksop and Retford, the Draft Local Plan is promoting an extended area of urban sprawl stretching from Worksop to within 2.5km of Retford, which conflicts with its own Green Gap Report.</p> <p>We suggest that the proposed Green Gaps ought to be revisited with additional areas being identified on the basis of how well they meet a range of criteria.</p>	<p>This comment appears, again, not to contest the principle of Green Gaps or the extent of the Proposed GG2 (Oldcotes – Langold – Carlton in Lindrick). BDC should compare the extent of proposed/committed/approved development with the proposed GG boundary and if necessary, make amendments. Reference should also be made to the Langold and Carlton NPs.</p> <p>The context for Green Gaps is explained in the Local Plan and in the Introduction and Methodology section of the 2019 Report. The exercise was not intended to be a District Wide landscape analysis, a role which has been fulfilled by earlier studies. Rather, it is intended to be a targeted assessment of areas of land around towns and larger villages.</p> <p>The approach to the assessment of and proposals for a Garden Village and Priority Regeneration Areas (including greenfield locations and power station sites) is explained in the Economy (para. 3.22), Vision (Strategic Objectives 1, 4 & 5) and Spatial Strategy Sections of the Local Plan.</p> <p>The eastern edge of the built up area of Worksop (Kilton) and the western edge of Retford (Ordsall) are 6 miles (9.5km) apart. It is acknowledged that there are existing and proposed large scale warehouse buildings along the A57, west of Worksop but these sites are within landscaped settings and do not create an impression of or represent continuous development. The proposed Bassetlaw Garden Village is separated from these buildings by the A1 and several large woodlands including Apleyhead, Sharps Hill and Top Wood (which is to be retained around a proposed employment site). The proposed Garden Village Site is triangular, with the narrow apex to the east. That point is still 1.25mls (2km) west of the edge of Retford and the majority of the site is some 2.5mls (4km) away. In addition, the western built up boundary of Retford is framed by the substantial proposed GG8.</p> <p>In Section 5.3 of the Local Plan, the principles of the proposed Garden Village and Policy ST3 require that at least 40% of the site area is given over to a green & blue infrastructure network that "...respects and enhances the landscape qualities of the area..." This will further minimise any perception of continuous built development between Worksop and Retford.</p> <p>It is not, therefore considered justified or appropriate to consider wider Green Gap designations across the district or that the proposed Garden Village site should be considered as a Green Gap.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 211 National Trust</p> <p>We have reviewed the Green Gaps Report Addendum October 2020 and were confused to note that our previous representation (much of which is replicated above) has been reported by paragraph 2.3 as ‘Support in principle’ for the policy, with no further consideration being given to the detailed comments. Clearly this does not adequately address our response in relation to Green Gaps.</p>	<p>The earlier comments began: <i>“Whilst the NT generally supports Policy ST34...”</i>. It is acknowledged however that the NT also suggested that:</p> <ol style="list-style-type: none"> 1. The policy should be more aspirational. 2. Proposals should be required to have specific regard to national and local character assessments, not just those intended to inform the Local Plan. 3. The Sherwood Forest Restoration Plan should be incorporated into policy. 4. It is not clear how GGs were identified beyond areas suggested by BDC. 5. It is unclear why land between Worksop and the A1 should not be considered as a GG and reference is made to: <i>“... the proposed Garden Village site promoting an extended area of urban sprawl stretching from Worksop to within 2.5km of Retford which conflicts with its on GG report.”</i> <p>Comments on these suggestions are set out below.</p> <ol style="list-style-type: none"> 1. It is considered that the policy, whilst soundly based and realistic, is aspirational in that it introduces Green Gaps into Bassetlaw planning policy for the first time. This is part of a wider strategy to achieve sustainable development that will meet economic, environment and social needs. 2. National and local landscape character assessments are considered in relation to several key aspect of the Local Plan. In addition to references to these in the Sites (Land Availability) Assessment and Green Gap reports, these studies/assessment either form or are referenced in other Local Plan background reports and evidence papers. However, a reference could be made in the explanation of Policy ST40 (Green Gaps) and it is recommended that para. 8.47 be amended to read: <i>“Evidence, including information for national and local landscape character assessment, will need to...”</i> 3. This reference now appears to be made at para 8.7.2 of the Nov. 2020 draft of the Local Plan, which provides a context for Policy ST43 (Trees, Woodlands and Hedgerows). There is detailed coverage of Sherwood Forest within Policy ST42 (Biodiversity and Geodiversity). The eight proposed Green Gaps include locations/ areas outside Sherwood Forest consequently, reference to a single, are specific restoration project is not appropriate. 4. The same points apply as to Comment Ref. 135 (above). The context for Green Gaps is explained in the Local Plan and in the Introduction and Methodology section of the 2019 Report. The exercise was not intended to be a District Wide landscape analysis, a role which has been fulfilled by earlier studies. Rather, it is intended to be a targeted assessment of areas of land around towns and larger villages. The approach to the assessment of and proposals for a Garden Village and Priority Regeneration Areas (including greenfield locations and power station sites) is explained in the Economy (para. 3.22), Vision (Strategic Objectives 1, 4 & 5) and Spatial Strategy Sections of the Local Plan. 5. The same points apply as to Comment Ref. 135 (above). The eastern edge of the built up area of Worksop (at Kilton) and the western edge of Retford (at Ordsall) are 6 miles (9.5km) apart. It is acknowledged that there are several existing and proposed large scale warehouse buildings along the A57, west of Worksop but these site are within landscaped settings and do not create an impression of or represent continuous development. The proposed Bassetlaw Garden Village is separated from these buildings by the A1 and several large woodlands including Apleyhead, Sharps Hill and Top Wood (which is to be retained around a proposed employment site). The proposed Garden Village Site is triangular, with the narrow apex to the east. That point is still 1.25mls (2km) west of the edge of Retford and the majority of the site is some 2.5mls (4km) away. In addition, the western built up boundary of Retford is framed by the substantial proposed GG8. <p>In Section 5.3 of the Local Plan, the principles of the proposed Garden Village and the Policy ST3 require that at least 40% of the site area is given over to a green & blue infrastructure network that <i>“...respects and enhances the landscape qualities of the area...”</i> This will further minimise any perception of continuous built development between Worksop and Retford.</p> <p>It is not, therefore considered justified or appropriate to consider wider Green Gap designations across the district or that the proposed Garden Village site should be considered as a Green Gap.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Re. no 1670041 Globe Consultants Ltd</p> <p>This policy identifies Retford East as Green Gap 6 which includes derelict brownfield land that desperately requires investment and development to deliver enhanced amenity to the locality along Blackstope Lane. By including such a site within the Green Gap policy, without sufficient acknowledgement that such investment will be supported where it delivers a net benefit to the amenities of the area, as opposed to securing its openness, the policy is likely to result in the perverse and counter-productive result of disqualifying the necessary investment.</p>	<p>There is a (demolished) former factory site off Blackstope Lane within the Green Gap. However, it adjoins a wet woodland (of habitat and landscape value (within Flood Zone 3) which runs across to the canal. Housing, further west along Blackstope Lane is outside the Green Gap.</p> <p>It is acknowledged that two other commercial premises (a stonemason and a lawnmower repairer) and a cleared site off Grove Road are not in the Green Gap. However, they form a contiguous unit and directly adjoin the built up area. It is appropriate, therefore, to use the Blackstope Lane, the railway line and Grove Road and the Green Gap boundary in this location.</p> <p>To the south, the contribution that the open land in the Idle valley (west of the railway) makes to the landscape setting of Retford is significant. To the north of Blackstope Lane the canal (a major green corridor in the Local Plan) is identifiable, long lasting and robust as a boundary for the Green Gap.</p> <p>The features referred to above are shown in photos 2, 3 & 4 in the appendix.</p> <p>The policy wording allows for essential development within Green Gaps and for development to have a positive impact on the "...openness, character, appearance and functionality of the landscape characteristics of the relevant Green Gap." where specified criteria can be met. Therefore, it will be possible for the existing businesses to invest in their sites and premises.</p> <p>However, it will be necessary for development to take account of the landscape and habitat value of brownfield land, which may be naturally regenerating, and the integrity of the Green Gap will need to remain intact</p>

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 110 Resident</p> <p>ST40 P129 Clarification or more detailed information is required on Green Gap 7 Retford South- Eaton to enable comment in the future.</p>	<p>The 2019 report and the 2020 addendum cover GG7 in detail and the comments above on Ref. 163 explain why some well planned development may be appropriate adjoining the existing built up area.</p>
<p>Ref. no 216 Derek Kitson Architectural Technologist Ltd</p> <p>Green Gap 7: Retford South – Eaton has much to commend it but there is a segment at its northern end adjacent to Whitehouses Road that is an intensive horticultural operation with the associated polytunnels, storage building, car parking and the adjacent football pitch and changing building. The Green Gap line should be relocated towards the south boundary of this operation.</p> <p>Land to the south of Whitehouses Road This is shown overlaid with the key for locally important open space, green gaps and playing field and outdoor sports facility. The latter is the local football pitch and changing facilities. However, the remainder of this larger location is an intensive horticultural operation with structures and car parking provision.</p> <p>All of the land on both the north and south side of Whitehouses Road has always been horticultural land, the majority of it owned and used by the Barker family who owned and worked Fairy Grove Nurseries, now a housing estate.</p> <p>The identification of a locally important space is incorrect and the idea that it is a green gap is wrong due to the intensive use and buildings.</p> <p>On the same plan and immediately to the west of the above land is the new housing development known as The Brambles and is located on the former Norman Nurseries. On this same inset plan it is hatched over as a green gap and underwashed with the Committed housing layer. It cannot be both. The green gap allocation should be redrawn.</p>	<p>The presence of this business and the playing field is recognised, and it is acknowledged that there are several associated small buildings/structures and greenhouses, albeit that the majority are temporary. Noting that Green Belt principles can be applied to Green Gaps, buildings for agriculture or forestry and facilities for outside recreation may be anticipated within them.</p> <p>If the boundary of the Green Gap were to be moved south to remove these uses/structures, it would be difficult to establish a recognisable long term boundary. Whitehouses Road/ Goosemoor Lane is a recognisable, robust and long term boundary for the Green Gap. The Appendix, photo 5 shows how the horticultural uses sit satisfactorily within with Green Gap</p> <p>North of Whitehouses Road/Goosemoor Lane (along the river up to the railway line, alongside the railway line and then south along a stretch of London Road) the land is outside the Green Gap. However, much of it is recognised as floodplain, wetland and playing fields and the landscape value, within the flat Idle valley, is already recognised and protected.</p> <p>On the Local Plan Proposals Map, the southern boundary of the Retford East Green Gap (GG6) runs along the north east side of the East Coast main line. However, it is acknowledged that, as drafted, it includes part of The Brambles residential development to the north. This should be amended by BDC. This may require a parallel small adjustment to the same boundary in the original (2019) Green Gaps report.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 223 Resident</p> <p>In our comments on the previous version of the draft Bassetlaw Local Plan 2020, we expressed the hope that Bassetlaw District Council would expand the proposed green gaps into the land areas immediately north and north-east of the settlement edge of Retford towards Tiln Lane and Clarborough, to maintain the separation of Retford and Tiln and of Retford and Clarborough (for details see Reference 377 in comments on the January 2020 Bassetlaw Local Plan). The officer response dismissed the proposal because of the significant landscape and heritage assets or existing designations that would limit and manage development in this location.</p> <p>The Bassetlaw Local Plan green gaps report addendum October 2020 contains statements (pages 12 and 18-19) that apparently support the incorporation into a green gap of the above-mentioned land areas to the north and north east of Retford. The statements on page 12 quoted below refer to a current consultation on changes to the planning system: Planning for the Future (August 2020). We observed that the above-mentioned land areas played a crucial part in “health and well-being, in terms of exercise” and “recreation” during the national lockdowns imposed as a result of the Covid-19 pandemic.</p> <p>The footpaths in these land areas were extensively used by pedestrians and dog walkers, including children. A green gap north and north-east of Retford would support the intent to “ask for beauty and to be far more ambitious for the places we create, expecting new development to be beautiful, and to create ‘net gain’ not just ‘no net harm’, with greater focus on ‘placemaking’ and ‘the creation of beautiful places’ with the NPPF”. Also the proposed green gap designation north and north east of Retford “could complement the intended (landscape and character led) masterplan approach that the new separate, green gap policy in the Bassetlaw Local Plan will require for development within or adjoining green gaps”.</p> <p>The green gaps report addendum proposes that “the extent and role of any green gap may be reconsidered when the Local Plan (or a successor document) is reviewed” (p18). We strongly encourage a prompt review of whether the land identified above (north and north-east of Retford) be included in a green gap. The green gaps policy clearly applies in detail to the land we refer to above (see statement in bold on pages 18 and 19 of the addendum), in particular the design proposals and the need to consider “the sequential approach that there are no appropriate sites for a proposed development outside the green gap in question”.</p> <p>Finally we expect that a green gap designation in the above-mentioned location would be helpful in encouraging development therein to include safe walking and cycling routes, as a natural choice for all shorter journey’s or as part of a longer journey. Perhaps a green gap designation will facilitate access to future grant aid in the regard. There are at present no designated safe cycling routes in the potential green gap north and north-east of Retford to connect with the green lane routes in Hayton and Clarborough Parishes. Unsafe cycling routes include Smeath lane (a very busy Lorry route, Sustrans advises caution) and the Chesterfield Canal towpath (too narrow for shared use by cyclists, walkers, dogs and fishermen). A green gap policy would perhaps encourage upgrading of footpath surfaces for all levels of walkers and cyclists with amenity tree planting, wildflower meadows, and vistas and viewpoints with seating provision. For and on behalf of my household.</p>	<p>The canal, forming the western boundary of GG5 (Clarborough – Welham), is a clear and permanent feature in the landscape. West and SSW of Clarborough the land is clearly open countryside across to Smeath Lane and beyond to Bolham Hall and Tiln Lane. To the north of Smeath Lane, the Idle Valley opens out and there is no settlement for 3 to 5 miles (5 to 8 km).</p> <p>New housing is being built west of Tiln Lane and south of Bolham Way, which extends the built-up area.</p> <p>In the north east quadrant of Retford there is an irregular and complex boundary to the built up area offering few opportunities to identify a long term robust boundary to a GG. In addition, there is no immediate pressure for development and the area is undistinguished in landscape terms.</p> <p>At present, therefore, it is not considered that there is justification to identify a new or extended Green Gap. However, this position could be reconsidered in a future version of the Local Plan.</p> <p>In the meantime, open countryside policies, the protection of the footpath network and the green corridor designations of the Canal and the River Idle represent an adequate and appropriate means of managing development.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 195 (Peaks Hill Farm) Freeths for Hallam Land Management (Peaks Hill Farm)</p> <p>Green Gaps policy does not appear to recognise that there may be circumstances where, for example, strategic transport links or other development infrastructure is required. Whilst it may be considered that sub-para.B.1. addresses this point, it would be helpful if the supporting text to this Policy acknowledge that certain forms of infrastructure that are considered necessary would be acceptable in regard to sub-para.B.1.</p>	<p>Peaks Hill Farm (north of Worksop) is the location for a large scale proposed development in the Local Plan (Policy 17:HS1). It is proposed for residential, employment, community and open space uses. The northern boundary of the proposed site, which was determined in part in relation to topography habitats and landscape, adjoins and forms the southern boundary of the Carlton in Lindrick – Worksop Green Gap. Off the B6045 there is a designated existing employment site. Policy HS1 requires the protection and extension of woodlands on the site and the provision of open space, and it is essential to protect the landscape integrity of the adjoining Green Gap.</p> <p>However, the policy wording allows for essential development within Green Gaps and for development to have a positive impact on the “...openness, character, appearance and functionality of the landscape characteristics of the relevant Green Gap.” where specified criteria can be met. Therefore, it will be possible for infrastructure required for the Peak Hill Farm site to be constructed, provided alternatives have been evaluated and that the Green Gap policy criteria are met. Commentary to this effect could be added to para 7.2.14 of the explanatory text.</p> <p>Further detailed aspects of the boundary of this Green Gap (at Carlton Forest) are considered in relation to the comment Ref. no 177 below.</p>

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 117 (Ordsall South) Barton Wilmore on behalf of landowners</p> <p>6.66 Policy ST40 is not justified and should be deleted. There is no need for this in the Local Plan as it is an unnecessary level of policy restriction.</p> <p>6.67 The purposes of the Green Gaps are not set out clearly in the draft Local Plan or in the background Green Gap document. Reference is made in the supporting texts to Policy ST40, to “Green Belt” policy and the 2009 Landscape Character Assessment as justification, as well as to ecology, recreation, access, settlement character and separation reasons. The rationale and justification for the Policy is unclear.</p> <p>6.68 Noting this, there is also no criteria used for defining specific areas or why Green Gaps 1-8 are justified. The Policy areas selected are therefore unjustified.</p> <p>6.69 The document states that Green Gaps do not preclude development (paragraph 8.4.6). Yet Part B introduces strict development control tests that would prevent pretty much most forms of development. Reference is made to demonstrating a ‘positive impact on openness’. As the Council is aware, Green Belt policy in NPPF refers to the tests of openness and permanence. It is unclear how the Council envisages a positive impact on openness could be achieved through development?</p> <p>6.70 It is unclear what the Green Gaps policy may achieve that would not be achieved by other policies at a national and local level and by good practice. It appears to be an attempt to introduce a Green Belt policy in all but name.</p>	<p>This comment is overstated. The approach to defining Green Gaps was intended to be broadly based, including:</p> <ul style="list-style-type: none"> - Using an existing evidence base (e.g. relevant NCAs and the 2009 Study). - Recognising recent commitments and potential Local Plan allocations. - Taking account of Neighbourhood Plans. - Information from recent site visits. <p>The extent to which the approach to Green Gaps reflects National Guidance and good practice is, therefore, a matter of opinion. The Local Plan is positively prepared, and the Green Gaps policy is part of a wider approach with an appropriate strategy to enable sustainable development, consistent with national policy. The 2009 assessment remains pertinent in conjunction with the NE National Character Areas. Green Gaps have been defined based on the emerging policy context, recognising existing commitments and emerging allocations for new housing and employment around settlements.</p> <p>The context for Green Gaps is explained in the Local Plan and in the Introduction and Methodology section of the 2019 Report. The exercise was not intended to be a District Wide landscape analysis, a role which has been fulfilled by earlier studies. Rather, it is intended to be a targeted assessment of areas of land around towns and larger villages.</p> <p>There is a clear justification for Green Gap policies, based on planning practice and guidance. Examples are drawn from Local and Neighbourhood Plans (see Section 3 in the 2019 Addendum report and this report). It is incorrect to state that Green Gaps are a backdoor way of introducing Green Belt into Bassetlaw. The analysis within this and other Green Gap reports is explicit on this point, but it is acknowledged that a clearer statement that it is not the intention to replicate Green Belt policy could be included in the explanation for Policy ST40.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 177 Axisped on behalf of FCC Environment</p> <p>(1.7 Policy ST40 – Green Gaps)</p> <p>1.7.1 Axis previously objected to the inclusion of their site within the Green Gap under Policy 34, Landscape Character. The Council have not prepared a response to these comments within their Summary of comments document. Our representations previously made are still relevant.</p> <p>1.7.2 FCC strongly disagree with the inclusion of their site in the Green Gap. FCC’s 8-hectare site is of low landscape value. It is acknowledged that Green Gaps do not prevent development from taking place, but the subjective policy tests in the emerging policy text would place additional restrictions on the proposed employment uses, contrary to the permitted uses on the east of the site.</p> <p>1.7.3 FCC’s site is not included in the assessment area of Green Gap 3 (Carlton in Lindrick/Worksop North) set out in the Bassetlaw Green Gaps Report (Nov. 2019). As such, we previously queried whether the inclusion of FCC’s site was an error.</p> <p>1.7.4 The Green Gap Addendum Report (October 2020) notes at paragraph 2.6 that a comment concerned the extent of Green Gap 3, between Carlton in Lindrick and Worksop, where it adjoins committed new housing north of Worksop. It is assumed that this relates to FCC’s previous comments. The response states: “There are no drafting issues; the comment aims to maximise development by reducing the Green Gap. This is not justified in landscape terms, given the scale of recent/ committed development.”</p> <p>1.7.5 The Green Gap Report (November 2019) describes the boundary as running along Red Lane which is located to the north of the site. FCC’s site and the land surrounding it has therefore not been assessed as part of this report and as such it is considered unsound to designate this additional land without fully assessing its landscape value. Given that the site was not included within this assessment area and that the Council have granted employment development on part of the site, it is clear that the Council do not consider the landscape in this area to be overly sensitive. Development within the western half of the site would be within the quarry base and as such visual impacts would be less when compared to the existing approved scheme within the east of the site.</p> <p>1.7.6 This Policy has been revised to include additional restrictive policy tests at paragraph B which states that development of undeveloped land and intensification of developed land will only be supported subject to meeting two criteria. The first, B1 states that the development must be essential in that location, and that there are no suitable sites outside of a Green Gap that could meet the needs of the development.</p> <p>1.7.7 FCC strongly object to this sequential based policy criteria, which would require FCC to demonstrate that there were no other suitable sites outside of the Green Gap before their site at Carlton Forest would be considered to accord with policy. FCC’s site is undoubtedly appropriate for development, as has been demonstrated by the existing permission. It comprises a sustainable, under-utilised site where development should be encouraged.</p> <p>1.7.8 The second criterion requires a Landscape Statement to be submitted to demonstrate that any proposal will have a positive impact on the openness, character, appearance and functionality of the landscape characteristics of the relevant Green Gap. This is an unnecessary and onerous required to apply to FCC’s site given that the site is previously worked for sand extraction and part of the site has planning permission for employment uses.</p> <p>1.7.9 Part of the site has planning permission for employment uses and given that the Council has granted employment development in this area, without the submission of a Landscape Statement, it would appear that the Council do not consider the landscape within this area to be particularly sensitive. The land within the western half of FCC’s site is no different in landscape value terms to the part of the site with planning permission. The Council’s approach to designating this site as Green Gap clearly contradicts the permission for employment development.</p> <p>1.7.10 As written, it is considered there are significant failings with Policy ST40 given that the policy proposes to designate land as Green Gap without undertaking an assessment of this land. The approach is clearly unjustified and unsound.</p>	<p>The consideration of an appropriate northern boundary of the proposed Peaks Hill Farm (large scale) housing site allocation led to the proposed Green Gap being moved southwards from that originally considered in the 2019 Green Gaps report. This decision recognised the clear landscape connection between the farmland either side of Red Lane BDC noted that, by including new woodland and open spaces in the design of the new housing, a satisfactory relationship could be created at the same time as providing a clear long term boundary for the Green Gap. However, it is acknowledged that in making those changes, the extent of the existing employment operations off the B6045, at Carlton Forest, south of the junction with Red Lane is not properly recognised by the Green Gap boundary as currently drafted. The boundary may be shown accurately, without changing the principle of the Green Gap using the curtilages of existing buildings, parking and servicing areas, as follows:</p> <ul style="list-style-type: none"> - South from Hundred Acre Lane to the rear of Sherwood Caravan storage, residential properties and the Milton Equestrian Centre. - West along Red Lane, turning south along the rear of the Hollings and Wright Engineering sites, a residential property and the telecoms mast up to the boundary of Elddis Transport. The area outside the Green Gap would include the recently permitted B1/B2/B8 development (18/01093/OUT). - West (as currently drawn) around the edge of the existing employment site denoted in the Local Plan. <p>These changes would not prejudice the integrity or landscape value of the Green Gap.</p> <p>There is, however, no justification in landscapes terms or in relation to habitat connectivity for the adjacent former quarry area, including the previously restored mound to be excluded from the Green Gap. These features are shown in photos 6 & 7 in the Appendix. It is understood that, although the planning history of the quarry is long and complex, there is a condition requiring restoration to a heathland habitat. This landscape/habitat focus supports the inclusion of the site in the Green Gap. The suggested boundary changes would negate some of the concerns about the application of the Green Gap policy. However, the landscape and habitat value of the restored minerals site (when restoration is completed in accordance with the planning conditions), indicate that the landscape led approach to deciding upon what type and extent of development may be appropriate to a Green Gap is reasonable and justified.</p> <p>The policy stance is reasonable for land included in a Green Gap. This matter is considered above.</p> <p>The boundary changes suggested above recognise current and committed employment uses but also considered the intention to secure the restoration of minerals sites to open habitats. The latter uses are entirely appropriate for inclusion in a Green Gap.</p>

TABLE OF COMMENTS RECEIVED AND SUGGESTED RESPONSES (CONTINUED)

COMMENT	SUGGESTED RESPONSE
<p>Ref. no 1671323 William Davis</p> <p>There remain significant objections to Policy ST40: Green Gap in terms of the principle of the policy in relation to GG4 and the supporting evidence used to prepare it. The policy wording requires development of undeveloped land or intensification of developed land (which would cover most development) to only be supported if it is essential and no alternatives exist outside the Green Gap; this would appear to be an attempt to introduce a 'green belt' style policy.</p> <p>It is considered that the purpose of the policy is confused. Part A of the policy refers to areas being designated for their "landscape quality and character of the land" rather than keeping settlements separated; indeed it is noted that no areas elsewhere are being protected for their landscape quality. While the Green Gaps Report Addendum (Oct 2020) refers to examples elsewhere, notably Adur (Policy 14) and Charnwood (CS11), these policies are focussed solely on preventing coalescence rather than the landscape. If this is the aim of the policy it should be reworded to follow the wording used in Adur and Charnwood:</p> <p>Extract from Adur Policy 14: Local green Gaps – "Within these areas any development permitted must be consistent with other policies of this plan, and must not (individually or cumulatively) lead to the coalescence of settlements."</p> <p>Extract from Charnwood Policy CS11: Landscape and Countryside – "We will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the separation between the built-up areas of these settlements."</p> <p>If Policy ST40 is intended to protect locally valued landscapes as is indicated in Part A of the policy, then it is considered essential that the methodology used to identify areas is based on a robust and recognised methodology. It is noted that the response to our previous comments confirmed that the methodology has not used the Guidelines for Landscape & Visual Impact Assessment Edition 3 (GLVIA3); as such it is considered that the Policy fails to meet the tests of soundness as it is not justified by proportionate evidence.</p> <p>It is also noted that in other Green Gaps (especially GG3: Carlton in Lindrick- Worksop North) the boundary of the designated area has been drawn to take account of the proposed Peak Hills Farm. This does not appear to have been a consideration for GG4 despite the potential for LAA206 to create a more defensible long-term boundary than the current footpath Our original objections remain as follows: Site Allocations:</p> <p>Landscape Study (November 2019):</p> <ul style="list-style-type: none"> • not a landscape character assessment; does not meet evidence required by NPPF • lack of methodology • document does not identify the author(s) nor their qualifications • weak descriptions and incorrect statements in the findings table • the Views and Landscape Features map for 14H, do not identify the locations of the photographs making it difficult to locate the viewpoints on the ground. • We are not told what lens/camera is used: images do not meet GLVIA3 guidance. <p>Green Gap Report (November 2019):</p> <ul style="list-style-type: none"> • No reference is made to the land around St Anne's Drive or Manor Lodge • Requires boundaries to be clear, long term and defensible but then uses a path in an open field which is not clear, defensible or recognisable other than on a map • The description and assessment at page 26, fails to set out the value of the landscape and simply lists observations and document-based findings and does not analyse, test and score them as required by the GVLIA3 (Box 5.1) • The Notable Views statement does not draw on or match the Landscape Study • fails to draw on relevant assessments/recommendations especially the 2009 LCA. 	<p>There is a clear justification for Green Gap policies in principle, based on planning practice and guidance. Examples can be drawn from Local and Neighbourhood Plans. In relation to this comment, the matter is, therefore not one of principle, but more about policy wording and the validity of Green Gap 4 (Worksop West – Shireoaks and Rhodesia).</p> <p>In terms of the policy wording, it is incorrect to state that Green Gaps are an attempt to introduce a Green Belt style policy. The analysis within this report and the previous Green Gap reports is explicit on this point. However, it is acknowledged that a clearer statement that it is not the intention to replicate Green Belt policy could be included in the Policy explanation.</p> <p>The policy cross references in the 2019 addendum report concerned the principle of Green Gaps and it was not intended that policies bespoke to other areas should be cut and pasted into Bassetlaw.</p> <p>This comment is, as was the case with earlier comments, overstated. It is not prescribed that GLVIA3 is used in all studies. Indeed, the approach to defining Green Gaps was intended to be broadly based, including:</p> <ul style="list-style-type: none"> - Use of existing evidence (e.g. the relevant NCAs and the 2009 Study). - Recognising recent commitments and potential Local Plan allocations. - Taking account of Neighbourhood Plans. <p>Information from recent site visits.</p> <p>With reference to the NPPF, it is not necessary that a landscape which is designated in some way (e.g., as a Green Gap) must be "valued."</p> <p>The extent to which the approach to Green Gaps reflects National Guidance and good practice is, therefore, a matter of opinion. There is no compelling argument that not using a methodology such as GLVIA3 renders the proposed policy unsound.</p> <p>This is a PROW, well used, long established and clearly visible on the ground. There is a connection onto Ashwood Road, and it is signed from the north/south track leading from Manor Lodge Farm to Mansfield Road, as shown in the photos 8 & 9 in the appendix.</p> <p>See above comments on the applicability of GVLIA3.</p> <p>These are in fact detailed in the main 2019 report.</p>

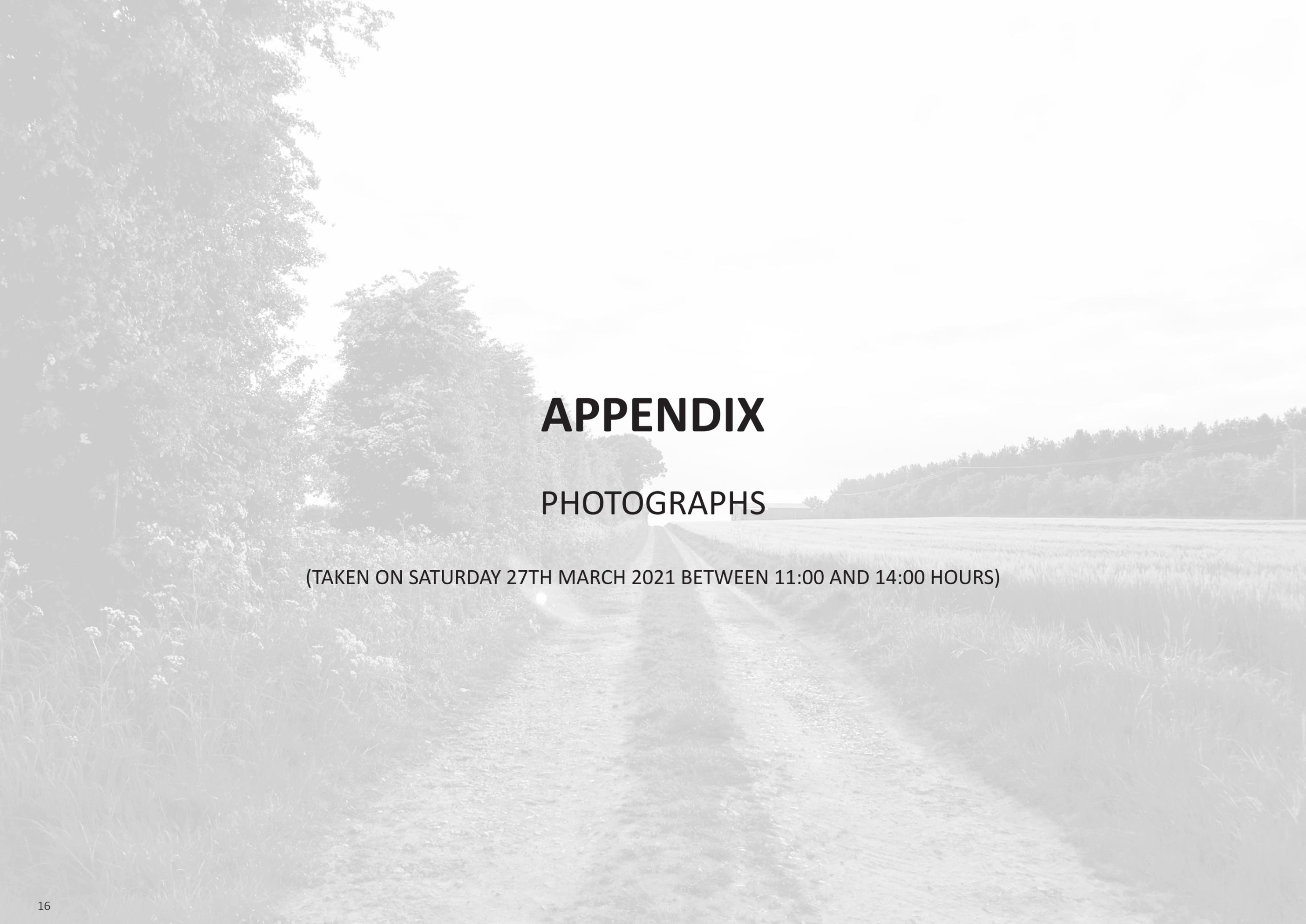
5 CONCLUSIONS

5.1 The principle of the identification of Green Gaps in the November 2019 report and the October 2020 Addendum Report remains sound in its approach. In addition, the way in which the proposed policy wording in the draft versions of the emerging Local Plan has evolved, recognises the need to place Green Gaps within an overall strategy. These will enable careful management of the impact of development to the edge of settlements and their wider countryside and landscape setting. These, along with other environmental and landscape designations, will support the delivery of the Council's required growth ambitions in a manageable and sustainable way.

5.2 A benchmarking exercise, and the review of wider planning and societal context for protecting and enhancing open areas around and within settlements in Sections 2 and 3 of this report, demonstrates that Green Gaps are a reasonable, effective and sound development management tool. A recent examination of a Neighbourhood Plan in Bassetlaw highlighted how the inclusion of a Green Gap designation and policy met the Basic Conditions. Although confined to a particular Parish in that instance, the principle of the reasonableness and soundness of proposed Green Gap designations has been accepted and therefore supports the principle for these to be extended across the whole District as part of a wider strategic planning process.

5.3 It is reasonable that interested parties took the opportunity, presented by the second consultation on the Draft Bassetlaw Local Plan, to comment further on the principle behind and the detailed approach to Green Gaps. In this further (Second) Addendum Report, the comments received have been given further detailed consideration. Where the points made are considered to be valid, some detailed changes may be made to the boundaries of the proposed Green Gaps to reflect current land use and commitments. In other instances, for example where the existing land uses or proposed new development can be accommodated within a Green Gap without compromising the overall principles of the proposed designation, it is considered that there is no need for more substantive changes to be made.

5.4 It is understood that the District Council, whilst retaining the principle of the wording of Policy ST 40, will consider the need for any detailed changes related to the overall comments received following feedback from previous consultations and to ensure that in the Publication Version of the Local Plan, the Policy is made as clear as possible for decision makers, landowners, applicants, local communities and external consultees.



APPENDIX

PHOTOGRAPHS

(TAKEN ON SATURDAY 27TH MARCH 2021 BETWEEN 11:00 AND 14:00 HOURS)



Photo 1 – View from London Road across the Idle valley to the edge of the built-up area (Landsdown Road)



Photos 2, 3 & 4. Blackstope Lane from the edge of the built-up area with wet woodland to the left and cleared factory site beyond



Photo. 5 View of horticultural operation off Whitehouses Road



Photos 6 & 7 Restored minerals/landfill site and sand quarry awaiting restoration within the Green Gap at Carlton Forest, off Red Lane



Photos 8 & 9 Footpath which forms the southern boundary of the Worksop West Green Gap





Bassetlaw
DISTRICT COUNCIL
— North Nottinghamshire —